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4 *In propria persona*

6 UNITED STATES DISTRICT COURT
7 FOR THE DISTRICT OF ARIZONA
8 PHOENIX DIVISION
9

10 Jason Crews,

11
12 Plaintiff,

13 v.

14 Donald Hiatt

15 Defendants.

Case No.: cv24-02129-PHX-CBD

Plaintiff's Request for Reconsideration of
Defendant's Motion to Seal

16
17 Plaintiff Jason Crews respectfully moves this Court to reconsider its Order (ECF No.
18 32) denying Defendant's Motion to Seal (ECF No. 24). This Motion for Reconsideration is
19 based on a material misunderstanding of the sensitive information contained in the
20 underlying motion.

21 In its Order, the Court denied the motion to seal because it understood the motion to
22 contain only Defendant's contact information (phone number and email address). However,
23 the motion in question (ECF No. 18) also contains Plaintiff's sensitive banking information,
24 which the Court specifically identified as the type of information that would justify sealing
25 under the "compelling reasons" standard cited in *Kamakana v. City & Cnty. of Honolulu*, 447
26 F.3d 1172, 1179 (9th Cir. 2006).

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 I. Legal Standard

3 As noted in the Court's Order, a party must present "compelling reasons" to justify
4 sealing court records. *Kamakana*, 447 F.3d at 1179. The Court specifically acknowledged that
5 banking information would constitute the type of sensitive personal information that might
6 warrant sealing to prevent it from becoming "a vehicle for improper purposes."

7 II. Argument

8 Reconsideration is warranted because:

- 9 1. The Court's Order was based on the understanding that the motion contained only
10 contact information (phone number and email address);
- 11 2. The motion actually contains Plaintiff's sensitive banking information, including
12 account details that could be used for improper purposes if publicly accessible;
- 13 3. The Court's own Order explicitly recognizes banking information as the type of
14 sensitive personal information that would justify sealing under the *Kamakana*
15 standard; and
- 16 4. Public access to Plaintiff's banking information creates a substantial risk of identity
17 theft and financial fraud, precisely the type of "improper purposes" that justifies
18 sealing under Ninth Circuit precedent.

19 III. Conclusion

20 For the foregoing reasons, Plaintiff respectfully requests that the Court reconsider its
21 Order denying the motion to seal. The presence of sensitive banking information provides
22 the "compelling reasons" required under *Kamakana* to justify sealing the motion.

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24
25 Dated: **November 12, 2024**

26 /s/ Jason Crews

27 Jason Crews

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2 **COPIES** of the forgoing were filed with the court
3 electronically via CM/ECF this same date.

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5
6 **COPIES** of the forgoing were emailed to
7 Donald Hiatt
8 donald@donhiatt.com

9 By: /s/ Jason Crews

10 Jason Crews
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